

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
DAYTON DIVISION**

JOHN AND JANE DOE NO. 1, et al	:	CASE NO: 3:22-cv-00337
	:	
PLAINTIFFS,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT	:	
BOARD OF EDUCATION, et al	:	
	:	
Defendants.	:	

**MEMORANDUM IN RESPONSE TO ANNE ROE’S MOTION TO INTERVENE AS
DEFENDANT, AND MOTION FOR LEAVE TO FILE *INSTANTER* MEMORANDUM
IN OPPOSITION TO PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION
(DOC. 13)**

Defendants Bethel Local School District Board of Education, and Lydda Mansfield, Lori Sebastian, Natalie Donahue, Danny Elam, Jacob King and Matthew Chrispin, in their official capacities only (“collectively referenced as “Defendants BOE”), respond to Anne Roe’s Motion to Intervene as Defendant, and Motion for Leave to File *Instanter* Memorandum in Opposition to Plaintiffs’ Motion for Preliminary Injunction (Doc. 13).

It is the mission of Defendant BOE to serve all its students. This includes Anne Roe. As Plaintiffs’ Complaint and the relief sought, including the request for preliminary injunction, directly affect Anne Roe’s federally protected rights as a transgender student accommodated under Board Policy. Anne Roe’s participation in the Preliminary Injunction proceeding, should the Court find it necessary to analyze factors three and four, is critical to fully analyze the impact on others and society under the asserted Ohio Open Meetings Act claim.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of January, 2023, I served the foregoing, via the Court's CM/ECF E-filing System which will send notification to the following:

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